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Pronghorn
Level 4
Box 4

In Reply Refer To:
Region 2/ES-SE

DEC 20 1996

Colonel David White
Range Management Office
56FW/RMO
14185 West Falcon Street
Luke Air Force Base, Arizona 85309-1659

Dear Colonel White:

This letter is to follow-up on your November 6, 1996, telephone request for the transmitter frequencies of the two radio-collared Sonoran pronghorn (*Antilocapra americana sonoriensis*) that periodically use the High Explosive Hill (HEH) on the South Tactical Range of Barry M. Goldwater Air Force Range (Goldwater Range). You requested the frequencies of the transmitters so that your Agency could determine the absence or presence of antelope during the ground surveys that precede aerial bombing and straffing missions. I appreciate your action to avoid harming the pronghorns.

My staff provided the telemetry information to you by voice mail on November 8, 1996. However, as Jim Lewis explained to you in the phone conversation of November 7, the absence of a radio signal does not guarantee that the species will be unharmed by the training activities. Only a small portion of the antelope herd is radio-collared. A transmitter may malfunction and a collared-animal may be present although there is no signal. As you noted, a ground survey by personnel with binoculars is also necessary. If endangered pronghorns are found on the impact area, it is our understanding that you will cancel or divert the mission to another HEH site.

The Fish and Wildlife Service (Service) granted the Arizona Game and Fish Department (AZGFD) a permit to survey the pronghorn population to provide data needed for recovery of the species. The pronghorns were radio-collared by AZGFD personnel. We request that you coordinate your monitoring and record keeping with John Herbert of AZGFD who provided us with the transmitter frequencies. Such coordination will minimize disturbance of these animals and supplement the recovery data base. His telephone number is (520) 342-0091.

As a Federal agency, the Air Force is responsible for consulting on any action, such as the training program, which may affect a federally-listed species. The consultation is a means to assure that Federal actions do not jeopardize the existence of a species and to minimize "take." The Endangered Species Act (Act) defines "take" of a species to mean ". . .to harass, harm, pursue, hunt, shoot, wound, kill, trap, or collect, or to attempt to engage in any such conduct." Your agency has requested the initiation of formal consultation concerning the possible effects of ongoing military activities at the Goldwater Range on the Sonoran pronghorn and, I understand that the formal consultation between the Service and Air Force will begin soon with completion scheduled early 1997.

Although you are making the effort to protect this species from possible effects of the training program, the Air Force does not have an incidental take statement. An incidental take statement is a portion of a completed consultation. Without an incidental take statement, your Agency risks violating the "take" provision of the Act. The Endangered Species Permits (Section 10 permits) also allow incidental take, but are only granted to persons/organizations engaged in actions to recover the species. A permit is not appropriate in this case. You should also be aware that the Air Force is obligated under Section 7(d) to refrain from making irreversible or irretrievable commitment of resources prior to the completion of consultation.

Thank you for your cooperation and for your efforts to minimize the training activity affects on the pronghorns. If you have any questions, call me at (505) 248-6982, or Sam Spiller, Supervisor, Ecological Services Field Office, Phoenix, Arizona at (602) 640-2720.

Sincerely,


 Regional Director

cc: ✓ John Herbert, Arizona Game and Fish Department, Phoenix, Arizona
✓ Supervisor, Ecological Services Field Office, Phoenix, Arizona
✓ Geographic Manager - Arizona, Region 2

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